

LEAD RENOVATION, REPAIR, AND PAINTING RULE INSPECTION REPORT

I. FACILITY: Jeffery Romano
DBA ECO Building Solutions
2102 Kimberton Rd. Unit 880
Kimberton, PA 19442
484-995-3963

II. DATE OF INSPECTION: January 13, 2016

III. EPA INSPECTORS: Kurt H. Rutzmoser, SSAI Employee, SEE Program

*(KHM)
3-1-2016*

IV. EPA REGION III, LAND AND CHEMICALS DIVISION (LCD)/TOXICS PROGRAMS BRANCH (TPB)

- John A. Armstead, LCD Director
- Harry Daw, LCD Associate Director for Office of Toxics and Pesticides
- Aquanetta L. Dickens, Chief, Toxics Programs Branch

V. PURPOSE OF INSPECTION:

The EPA conducted an inspection of ECO Building Solutions in response to a tip/complaints received alleging that ECO Building Solutions is not in compliance with the Renovation, Repair, and Painting Rule while performing renovations.

The initial tip/complaint was received by the EPA RAV system on November 11, 2015. The inspection was performed in order to determine ECO Building Solutions' level of compliance with the Renovation, Repair, and Painting Rule.

VI BACKGROUND INFORMATION:

The complainant, (b) (6) submitted a declaration of complaint dated December 14, 2015. Included in the declaration is a copy of the contracted scoop of work, and test results for the paint chips tested.

EPA conducted a FLPP data base search December 28, 2015 and determined that ECO Building Solutions is a firm certified company.

Inspector Rutzmoser spoke with (b) (6) and arranged for a site visit. On December 23, 2015 Inspectors Rutzmoser and Korbar visited (b) (6) Byers Road, Chester Springs, PA. The inspectors introduced and identified themselves to (b) (6) (b) (6) signed a consent for access form.

(b) (6) and the inspectors walked the exterior frontage of the property and she

explained that Mr. Romano had not cleaned up properly and she showed the inspectors a container of paint chips debris that were collected by her after the job was completed. (photograph # 0961). She stated that cedar shingles and wood from the garage and chicken coop were piled behind the garage. The inspectors took photographs of the completed work, which included the replacement of the garage roof, the repair and painting of the main house roof, the removal and replacement of the chicken coop and shed roof. Paint chips were observed on the ground and photographs were taken.

It was observed by the inspectors that the exterior of the house is constructed of wooden siding and there is considerable chipping and peeling paint. Chipping and peeling paint was observed on the shed and chicken coop as well. The inspectors walked across the street, uphill to obtain some photographs of the front porch roof and the main house roof. Inspector Rutzmoser walked behind the garage area and took photographs of the roofing debris and wood debris that was piled behind the garage. The inspectors thanked (b) (6) for her time and they left the site.

An inspection confirmation letter was sent to Jeffery Romano, owner of ECO Building Solutions on December 29, 2015. An inspection was set for January 13, 2016. In the letter, the EPA requested that Mr. Romano make available for the inspectors all contracts for renovations they performed during the past year. Inspector Rutzmoser spoke with Mr. Romano on the phone and the inspection meeting was confirmed for (b) (6) Nutt Road Phoenixville PA at 3 PM, on January 13, 2016.

According to EPA databases, property at (b) (6) Byers Road, Chester Springs PA is not located in an area of potential Environmental Justice concern. The latitude/longitude coordinates for this property address are (b) (6) latitude and (b) (6) longitude.

According to Real Quest, the (b) (6) Byers Road, Chester Springs PA property was built in 1860.

According to Pa. Department of Health there have been no known reports of elevated blood lead levels for this property address.

On December 30, 2015 a notification of inspection was sent to C. Slaybaugh of the Pennsylvania Department of Labor and Industry.

VII. OPENING CONFERENCE

On January 13, at approximately 3:00 PM, Inspector Kurt H. Rutzmoser met Mr. Romano at (b) (6) Nutt Road Phoenixville PA. Inspector Rutzmoser introduced himself and presented his credentials to Jeff Romano.

Inspector Rutzmoser presented and explained the Notice of Inspection Form to Mr.

Romano both the inspector and Mr. Romano signed the form. Next, Inspector Rutzmoser presented and explained the Confidential Business Information Form (CBI) to Mr. Romano and Mr. Romano signed the form. A brief discussion explaining the CBI occurred. Mr. Romano had no additional questions concerning the forms.

After these forms were presented and signed, the inspector proceeded to explain to Mr. Romano that the purpose of the inspection was to determine ECO Building Solutions' level of compliance with the Renovation, Repair, and Painting Rule.

Mr. Romano stated to the inspectors that he was aware of the Renovation, Repair, and Painting Rule (RRP). Mr. Romano stated he is a certified renovator and that he has a firm certification as well. Mr. Romano provided a copy of his certifications to inspector Rutzmoser.

He stated that the company accomplished approximately 10 large jobs per year (that were contracted.) He stated that 1 or 2 contracts per year were pre-1978 residential. He stated that he has one job currently that is a pre-1978 residence, he accomplished (b) (6) job and there was one additional kitchen remodeling job that was completed last year.

Mr. Romano provided inspector Rutzmoser the contracts and Renovation records for two projects. The inspector and Mr. Romano discussed the complaints on the roofing job at (b) (6) Byers Rd. Mr. Romano stated that the main house roof did not test positive for lead. He provided copies of the lead tests. He stated that he used plastic sheeting to catch the scrapings and he used a hepa vacuum to clean up. He provided a copy of the renovation checklist for the Byers Rd. contract.

When asked if he used a leaf blower on the job as (b) (6) stated in her complaint. Mr. Romano stated that the work was done in the spring time and that after the main roof had been under coated, a leaf blower was used to blow off the seed pods before applying the next coat of roof paint.

He stated that all chips and scrapings were trash bagged and disposed of in municipal waste. The old metal roof on the chicken coop was removed and scraped and the cedar shingles were removed and placed on the pile of old cedar shingles on the pile behind the garage. He stated that he did not remove any old painted wood when accomplishing this project. He also stated that none of the old painted wood presently on the pile was placed there by him or any of his workers.

He stated that he did not lead test the old metal chicken coop roof. He stated that he used plastic sheeting and followed lead safe protocols when removing the old metal chicken coop roof. He stated that he did not disturb any wood painted surfaces while performing this roofing job.

He explained that the removal of the cedar shingle pile was going to be assumed by the home owner. A verbal agreement was made with the homeowner to reduce the costs. Mr. Romano provided a copy an e-mail to verify this agreement.

He said that total revenues during the past year were approximately \$200,000 dollars. Mr. Romano stated that the company has been in business for 8 years and that he does not have any additional employees. He stated that he does occasional subcontract work and hires day laborers, but if possible he does the majority of the work himself. He stated that he is always on the job site as the certified renovator.

The contract Mr. Romano provided for the Hares Hill Rd. project included a scope of work the explained the demolition of an existing wall and removal and replacement of windows and doors for the kitchen, living, and dining rooms. Mr. Romano included the lead testing plan with the test results.

Mr. Romano stated that he left the Renovate Right Booklet for both homeowners but that he did not get their signatures of receipt.

Mr. Romano stated that to his knowledge there were no children 6 years or under living in these two homes (b) Brayers Lane has a 19 year old teenager living there.

VIII. CONTRACTS COLLECTED:

RENOVATION CONTRACTS:

<u>ADDRESS</u>	<u>CONTRACT DATE</u>	<u>YR BLT</u>
(b) Byers Road, Chester Springs, PA	3/05/2015	1860
(b) Hares Hill Rd. Phoenixville, PA	7/15/2013	1959

IX. CLOSING CONFERENCE

Inspector Rutzmoser provided a copy of the Receipt for Documents Form that he and Mr. Romano signed.

Inspector Rutzmoser provided Mr. Romano with a compliance assistance package and briefly explained its contents. Mr. Romano showed inspector Rutzmoser the Heap vacuum and attachments used to sand painted surfaces and contain the dust. He also showed

inspector Rutzmoser the pop up wall dividers he utilizes when doing interior renovations.

Inspector Rutzmoser asked Mr. Romano if he had any additional questions. The inspector explained that an inspection report would be generated and that it would be reviewed by EPA compliance personnel and a determination of compliance would be made. He would be notified if there were any deficiencies.

Inspector Rutzmoser thanked Mr.. Romano for his time and he left the site.